

AO 91 (Rev. 11/11) Criminal Complaint

## UNITED STATES DISTRICT COURT

for the  
Southern District of TexasUnited States Courts  
Southern District of Texas  
FILED

January 27, 2023

Nathan Ochsner, Clerk of Court

United States of America

v.

Case No. 7:23-MJ-158

Jose Guajardo (1987 / US )  
Sergio Ledesma (1984 / US)  
Jaime Longoria (1964 / US)

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 01/24/2023-01/26/2023 in the county of Hidalgo in the  
Southern District of Texas, the defendant(s) violated:

## Code Section

## Offense Description

21 USC, 841 (a)(1)

Knowingly and intentionally possess with intent to distribute approx. 68.85 kilograms of cocaine a schedule II Controlled Substance.

21 USC, 846

Knowingly and intentionally Conspire to Possess with intent to Distribute approx. 68.85 kilograms of cocaine, a schedule II Controlled Substance.

This criminal complaint is based on these facts:

See Attachment A

☒ Continued on the attached sheet.

/s/ Karl de la Fuente

Complainant's signature

Karl de la Fuente, HSI Agent

Printed name and title

Submitted by reliable electronic means, sworn to and  
attested telephonically per FED.R.CR.4.1, and probable  
cause found on:Date: 01/27/2023 at 7:29 a.m.City and state: McAllen, Texas

Judge's signature

J. Scott Hacker, United States Magistrate Judge

Printed name and title

**Attachment "A"**

**Re: Jose GUAJARDO, Sergio LEDESMA, and Jaime LONGORIA**

On or about January 24, 2023, HSI-McAllen in collaboration with DEA-McAllen seized 36 bundles of suspected cocaine with an approximate weight of 44.2 kilograms.

The bundles were field tested and tested positive for the characteristics of cocaine. On the same date, agents received information that Jose GUAJARDO was a co-conspirator in the transportation of the cocaine seized and the 36 bundles were destined to be delivered to additional co-conspirators soon.

On January 25, 2023, agents conducted surveillance and obtained an audio recording of a meeting that took place at Jaime LONGORIA's residence. At the meeting, GUAJARDO, LONGORIA, Sergio LEDESMA, and an additional co-conspirator discussed the delivery of the 36 kilograms of cocaine. Agents reviewed the audio recording of the meeting and learned that all 4 individuals discussed that the delivery of the 36 bundles of cocaine to LONGORIA's Edinburg residence was to occur early the next morning.

Also, during the above-mentioned meeting, the 4 individuals discussed that there was an additional 20 kilograms of cocaine already at LONGORIA's residence.

On January 26, 2023, Agents provided 36 bundles of sham cocaine to be delivered to LONGORIA's residence. LEDESMA received the sham cocaine at LONGORIA's property.

Approximately 5 minutes after the delivery of the sham cocaine, agents executed a search warrant for LONGORIA's property.

Agents located an RV on LONGORIA's property. Upon a search of the RV, the 36 bundles of sham cocaine were recovered, in addition to boxes containing an additional 20 bundles of suspected cocaine weighing approximately 24.65 kilograms. The boxes of sham cocaine were directly next to the box of the 20 kilograms of suspected cocaine in a compartment underneath a bed. LEDESMA was also located in the RV. No one claimed ownership of the RV.

During the execution of the search warrant, LONGORIA was found outside on the property.

While agents were at the search warrant, other agents noticed GUAJARDO in a white Jeep near the location of the search warrant. GUAJARDO was driving near S Alamo

Rd and E Iowa Rd and pulled into El Grano De Oro at that intersection, to which GUAJARDO later stated he purposely drove there to try to avoid law enforcement.

**GUAJARDO, LEDESMA, and LONGORIA were transported to the HSI McAllen office for interviews.**

GUAJARDO stated he facilitated the transportation of the cocaine and would get paid \$100 per kilogram transported. GUAJARDO provided consent to the search of his phone, which revealed communications involving the transportation of Cocaine related to LONGORIA's residence. Specifically, agents also found audio/text messages between GUAJARDO and LEDESMA having conversations about the coordination of delivering Cocaine to LONGORIA's residence. In one message, there is a conversation about the "56," the exact amount from the 20 kg already on property along with the 36 kg that was planned to be brought to the property. GUAJARDO stated the movement of Cocaine was coordinated by LEDESMA and the other co-conspirator while LONGORIA was aware of the dealings. GUAJARDO described himself as the intermediary between LEDESMA and the other co-conspirator.

LEDESMA stated he had no knowledge of the cocaine. LEDESMA stated he was in the bathroom in the RV when law enforcement entered the property to conduct the search warrant. Law enforcement on scene described that the toilet area LEDESMA claimed to be using was still dusty, had no water, and did not appear disturbed. LEDESMA first stated he was actually using the bathroom, but then stated he was going to use the bathroom when agents challenged his story.

LONGORIA spoke to agents before confirming he wanted legal counsel. During conversation, LONGORIA stated he had no knowledge of the cocaine. LONGORIA stated his yard guy and LEDESMA are the only two who have access to the property other than him. At some point, LONGORIA stated if he said anything, it would be "cutting my own throat."